

EXHIBIT “B”

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

JAMES O'REILY,

Plaintiff,

V.

GENERAL MOTORS LLC, GENERAL MOTORS HOLDING CORPORATION, GENERAL MOTORS OVERSEAS DISTRIBUTION LLC, GENERAL MOTORS INVESTMENT MANAGEMENT CORPORATION, GENERAL MOTORS TREASURY CENTER, LLC, BROOKLYN AC-DELCO, INC., and AC-DELCO,

Defendants.

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CIVIL ACTION NO:

Jury Trial Demanded

AFFIDAVIT OF RICK HANSEN

I, Rick Hansen, having been duly sworn according to law, declare and affirm that the facts set forth in this Affidavit are true and correct to the best of my knowledge, information and belief:

1. I am over the age of eighteen (18), of sound mind and body, and am fully competent to testify to the matters stated herein. I make this Affidavit based upon my personal knowledge and General Motors' information available to me. The statements contained herein are true and correct.

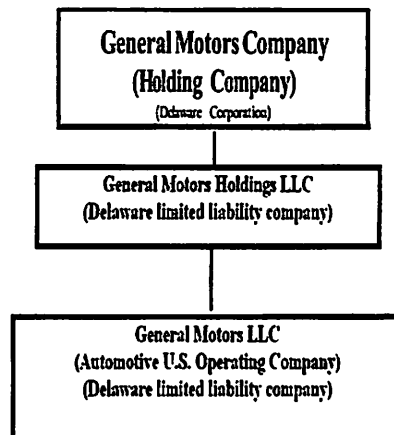
2. I serve as the Corporate Secretary of General Motors Company and its subsidiaries, including, General Motors LLC, General Motors Overseas Distribution, and General Motors Treasury Center, LLC. As such, I am familiar with and have personal knowledge of the corporate structure of General Motors Company and its subsidiaries.

3. The present General Motors Company is a Delaware corporation with its principal place of business in Wayne County, Michigan. General Motors Company is a holding company

that has no automotive business operations and does not design, manufacture, or sell AC Delco batteries.

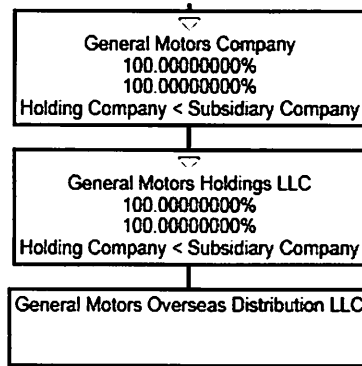
4. General Motors Holding Corporation is the former name of the current General Motors Company. General Motors Holding Company changed its name to General Motors Company on October 16, 2009.

5. General Motors LLC is a Delaware limited liability company with its principal place of business in Michigan. General Motors LLC designs in part, manufactures in part and distributes in part AC-Delco batteries. The hierarchal relationship of General Motors LLC is shown graphically as follows:

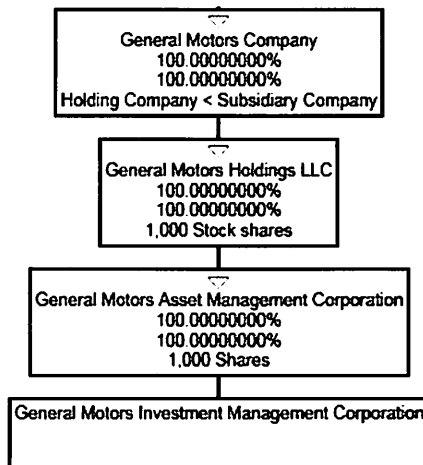


6. Neither AC Delco nor Brooklyn AC-Delco are legal entities. They fall under the umbrella of General Motors LLC, who is the proper defendant for the allegations in Plaintiff's Complaint.

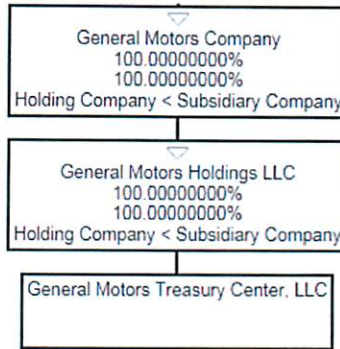
7. General Motors Overseas Distribution LLC is a Delaware limited liability company that is involved in selling General Motors U.S. vehicles to overseas markets. It is not involved in the business of designing, manufacturing or distributing in the U.S. automotive components, such as AC Delco batteries. The hierarchal relationship of General Motors Overseas Distribution is shown graphically as follows:



8. General Motors Investment Management Corporation is a Delaware corporation that manages the pension assets of certain General Motors employee benefit plans. It is not involved in the business of designing, manufacturing or distributing automotive components, such as AC Delco batteries. The hierarchal relationship of General Motors Investment Management Corporation is shown graphically as follows:

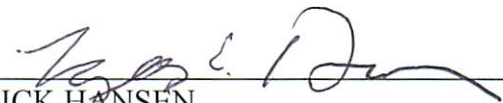


9. General Motors Treasury Center, LLC, is a Delaware limited liability company with its principal place of business in Michigan. General Motors Treasury Center, LLC is a payment entity involved in General Motors' payment netting process. It is not involved in the business of designing, manufacturing or distributing automotive components, such as AC Delco batteries. The hierarchal relationship of General Motors Treasury Center, LLC, is shown graphically as follows:



I hereby declare under penalty of perjury the foregoing is true and correct.

Date: March 6, 2020



RICK HANSEN

Sworn to and subscribed before me this 6th day of March 2020 in New York,
New York, _____ County.



Notary Public

My Commission Expires: November 16, 2023

ROBIN HALL
NOTARY PUBLIC-STATE OF NEW YORK
No. 01HA6333228
Qualified in New York County
My Commission Expires 11-16-2023

